

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Michael Qualls,	)	CASE NO: 4:22-CV-02186-RBH0KDW
	)	
Plaintiff,	)	
	)	
vs.	)	<b>Defendant Town of McBee's</b>
	)	<b>Motion for Summary Judgment</b>
Town of McBee, Barbara Lisenby, and	)	
Terri King,	)	
	)	
Defendants,	)	
_____	)	

TO: THE ABOVE-NAMED PLAINTIFF AND HIS ATTORNEY:

Defendant Town of McBee (“this Defendant”), by and through the undersigned legal counsel, hereby files the instant Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. The legal basis for the Defendant’s Motion for Summary Judgment is that there exists no genuine issue of material fact for trial and that the Defendant is entitled to summary dismissal of all claims brought against it. In support thereof, the Defendant further relies upon the attached memorandum, argument of legal counsel, and any other items received by this Court.

WILLCOX, BUYCK & WILLIAMS, P.A.

By: s/ J. Scott Kozacki  
J. Scott Kozacki  
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ATTORNEY FOR TOWN OF MCBEE

June 20, 2023  
Florence, South Carolina